

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

THE ESTATE OF YARON UNGAR, et al.,

Plaintiffs,

v.

THE PALESTINIAN AUTHORITY, et al.,

Defendants.

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C.A. No. 00-105L

**DEFENDANT THE PALESTINE LIBERATION ORGANIZATION’S MOTION FOR
ENTRY OF A PROTECTIVE ORDER REGARDING PLAINTIFFS’ NOTICE OF
TAKING THE DEPOSITION OF AHMED QUREI**

Defendant The Palestine Liberation Organization (“PLO”), through counsel, respectfully moves this Court pursuant to Federal Rule of Civil Procedure (“Rule”) 26(c) to enter a protective order regarding the Notice of Deposition served by Plaintiffs, pursuant to Rule 30, for a deposition of Ahmed Qurei, an individual who is located in the Occupied Palestinian Territory (West Bank).

For the reasons set forth in the accompanying Memorandum, which establish the requisite good cause, Defendant PLO requests that the Court prohibit Plaintiffs from taking the deposition of Ahmed Qurei.

FEDERAL RULE OF CIVIL PROCEDURE 26(c)(1) CERTIFICATION

Counsel for Defendant PLO hereby certify that, as required by Fed. R. Civ. P. 26(c)(1), they have conferred with all parties or non-parties who may be affected by the relief sought in the Motion in a good faith effort to resolve the issues raised in the Motion and have been unable to do so.

LOCAL RULE Cv 7(e) REQUEST FOR ORAL ARGUMENT

Pursuant to LR Cv 7(e), Defendant PLO respectfully requests oral argument on the issues raised in this Motion. Defendant PLO estimates that an oral argument on this Motion will last approximately one hour.

Respectfully submitted,

Dated: September 9, 2010

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 9th day of September 2010, a true and genuine copy of the foregoing was filed by ECF, which will automatically send notification and a copy of such filing to:

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